

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**TYRESE DREW,**

**Plaintiff,**

**vs.**

**CORECIVIC, Inc., et. al.,**

**Defendants.**

**Case No. CIV-23-286-JAR**

---

**DEFENDANTS' PRELIMINARY EXHIBIT LIST**

---

COME NOW Defendants CoreCivic, Inc., and Norwood pursuant to this Court's Scheduling Order of December 14, 2023 [Doc. #30], hereby submitting the following preliminary exhibit list. As discovery is ongoing, Defendants reserve the right to supplement this exhibit list and identify additional exhibits and evidence.

**EXHIBITS:**

No.	Description
1.	Plaintiff's incarceration medical records before the incident of 2/7/22, to include his medical records and his mental health records.
2.	Plaintiff's medical records and mental health records related to the incident of 2/7/22 and including records from outside medical providers, to include records from OU Medical Center, Lindsay Municipal Hospital, Air evac records, North Winds Nursing Center, and medical, physical therapy, occupational therapy, and mental health records from care provided following Plaintiff's parole on or about October 24, 2022.
3.	Plaintiff's use of the administrative remedies process during his placement at Davis Correctional Facility, during his facility placement following the incident of 2/7/22, and his use, if any, of the administrative remedies process following his transfer to supervised probation.
4.	All records associated with Plaintiff's Oklahoma Department of Corrections incarceration file and placement at Davis Correctional Facility, including housing assignment records, commissary/trust account records, misconduct and disciplinary history records, security classification records, and transfer recommendations.

5.	Davis Correctional Facility Corrections Incident Packet No. 2022-1001-080-I, incident reports by responding staff, and associated materials such as hand-held video and Milestone surveillance video.
6.	American Correctional Association audit reports for 2019 and 2022 related to re-accreditation of Davis Correctional Facility
7.	Oklahoma DOC operational audit reports of Davis Correctional Facility for 2020, 2021, and 2022.
8.	OK Department of Corrections Offender Management System case management records, case notes, and classification records for Plaintiff, inmate Alexander Barrett, inmate Gabe Wainscott, inmate Kurtis Simmons, and inmate Caleek Moore.
9.	Davis facility and CoreCivic hosted electronic communications related to Plaintiff, inmate Alexander Barrett, inmate Gabe Wainscott, inmate Kurtis Simmons, and inmate Caleek Moore. And the incident of 2/7/2022.
10.	Oklahoma DOC IG investigation records regarding incident of 2/7/22 and Gabe Wainscott, #772390 and Alexander Barrett, #637582.
11.	Records and materials produced pursuant to discovery requests.
12.	Oklahoma Department of Corrections and CoreCivic policies related to Plaintiff's incarceration at Davis Correctional Facility.
13.	Alexander Barrett, #637582, field file (with OK DOC)
14.	Gabe Wainscott, #772390, field file (with OK DOC)
15.	Caleek Moore, #680957, field file (with OK DOC)
16.	Kurtis Simmons, #852759, field file (with OK DOC)
17.	Any exhibits listed by the Plaintiff or necessary for rebuttal purposes.
18.	Any relevant exhibits obtained as discovery continues.

Respectfully submitted,



DARRELL L. MOORE, OBA #6332  
 J. RALPH MOORE, P.C.  
 P.O. BOX 368  
 PRYOR, OK 74362  
 (918) 825-0332  
 (918) 825-7730 fax  
 Attorney for Defendants

**Certificate of Service**

I hereby certify that on January 12, 2024, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants: (insert names)

Laurie Koller, OBA #16857  
Ashley Leavitt, OBA #32818  
Koller Trial Law, PLLC  
[laurie@kollertriallaw.com](mailto:laurie@kollertriallaw.com)  
[ashley@kollertriallaw.com](mailto:ashley@kollertriallaw.com)

And

Jim Buxton, OBA #19057  
Buxton Law Group  
[jim@buxtonlawgroup.com](mailto:jim@buxtonlawgroup.com)



---

DARRELL L. MOORE